

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, EL PASO DIVISION

FILED
09/19/2023
Clerk, U.S. District Court
Western District of Texas

By: **FMorales**
Deputy

USA
vs.
(1) ROBINSON JOSUE SAAVEDRA-CARUCI

§
§ CRIMINAL COMPLAINT
§ CASE NUMBER: EP:23-M -03015(1) - MAT
§
§

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **September 17, 2023** in **El Paso** county, in the **WESTERN DISTRICT OF TEXAS** defendant did, being an alien to the United States, enter, attempt to enter, or was found in the United States after having been previously excluded, deported, or removed from the United States without receiving permission to reapply for admission to the United States from the Attorney General of the United States and the Secretary of Homeland Security, the successor pursuant to Title 6, United States Code, Sections 202(3), 202(4), and 557

in violation of Title 8 United States Code, Section(s) 1326

I further state that I am a **Border Patrol Agent** and that this complaint is based on the following facts: *"The DEFENDANT, Robinson Josue SAAVEDRA-Caruci, an alien to the United States and a citizen of Venezuela was found approximately 0.2 miles West of the Ysleta Port of Entry in El Paso, Texas in the Western District of Texas. From statements*

Continued on the attached sheet and made a part of hereof.

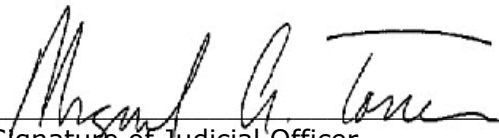
Sworn to before me,

/s/ Heredia, Frank A.
Signature of Complainant
Border Patrol Agent

September 19, 2023
Date

at EL PASO, Texas
City and State

MIGUEL A. TORRES
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer
**OATH TELEPHONICALLY SWORN
AT 1:00 P.M.
FED.R.CRIM.P. 4.1(b)(2)(A)**

CONTINUATION OF CRIMINAL COMPLAINT - EP:23-M -03015(1)

WESTERN DISTRICT OF TEXAS

(1) ROBINSON JOSUE SAAVEDRA-CARUCI

FACTS (CONTINUED)

made by the DEFENDANT to the arresting agent, the DEFENDANT was determined to be a native and citizen of Venezuela, without immigration documents allowing him to be or remain in the United States legally. The DEFENDANT has been previously removed from the United States to Venezuela on August 15, 2023, through Satan Teresa, New Mexico. The DEFENDANT has not previously received the expressed consent from the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission into the United States.

Because this affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

IMMIGRATION HISTORY:

The DEFENDANT has been deported 1 time(s), the last one being to VENEZUELA on August 26, 2023, through SANTA TERESA, NM

CRIMINAL HISTORY:

NONE